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| COUNSEL/PARTIES OF RECORD                     |              |
| APR 13 2022                                   |              |
| CLERK US DISTRICT COURT<br>DISTRICT OF NEVADA |              |
| BY: _____                                     | DEPUTY _____ |

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SECURITIES AND EXCHANGE COMMISSION  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
Corporation; J&J CONSULTING SERVICE,  
INC., a Nevada Corporation; J AND J  
PURCHASIN LLC; SHANE M. JAGER;  
JASON M. JONGEWARD; DENNY  
SEYBERT; and ROLAND TANNER;

Defendants;

THE JUDD IRREVOCABLE TRUST; PAJ  
CONSULTING INC; BJ HOLDINGS LLC;  
STIRLING CONSULTING, L.L.C.; CJ  
INVESTMENTS, LLC; JL2  
INVESTMENTS, LLC; ROCKING HORSE  
PROPERTIES, LLC; TRIPLE THREAT  
BASKETBALL, LLC; ACAC LLC;  
ANTHONY MICHAEL ALBERTO, JR.; and  
MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612

**TEMPORARY  
RESTRAINING ORDER AND  
ORDERS: (1) FREEZING ASSETS; (2)  
REQUIRING ACCOUNTINGS; (3)  
PROHIBITING THE DESTRUCTION  
OF DOCUMENTS; AND (4)  
GRANTING EXPEDITED  
DISCOVERY; AND (5) ORDER TO  
SHOW CAUSE RE PRELIMINARY  
INJUNCTION**

1 This matter came before the Court upon Plaintiff Securities and Exchange Commission's  
2 *Ex Parte* Application for Temporary Restraining Order and Orders (1) Freezing Assets; (2)  
3 Requiring Accountings; (3) Prohibiting the Destruction of Documents; and (5) to Show Cause  
4 Re Preliminary Injunction (the "TRO Application").

5 The Court, having considered the Commission's Complaint, the TRO Application and  
6 supporting memorandum of points and authorities, the supporting declarations and exhibits, and  
7 the other evidence and argument presented to the Court, finds that:

8 A. This Court has jurisdiction over the parties to, and the subject matter of, this  
9 action.

10 B. The Commission has made a sufficient and proper showing in support of the relief  
11 granted herein, as required by Section 20(b) of the Securities Act of 1933  
12 ("Securities Act") [15 U.S.C. § 77t(b)] and Section 21(d) of the Securities  
13 Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78u(b)], by evidence  
14 establishing a *prima facie* case and likelihood that Defendants Matthew Wade  
15 Beasley, Christopher Ronn Humphries, Shane Michael Jager, Jason Myers  
16 Jongeward, Jeffrey Jason Judd, Denny Seybert, Roland Tanner, Beasley Law  
17 Group PC, J&J Consulting Services, Inc. (Alaska), J&J Consulting Services, Inc.  
18 (Nevada), and J and J Purchasing LLC (collectively herein, "Defendants") have  
19 engaged in, are engaging in, are about to engage in, and will continue to engage  
20 in, unless restrained, transactions, acts, practices and courses of business that  
21 constitute violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)];  
22 Section 10(b) of the Securities Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-  
23 5 thereunder [17 C.F.R. § 240.10b-5]; Section 5(a) and (c) of the Securities Act  
24 [15 U.S.C. § 77e(a), (c)]; and/or Section 15(a)(1) of the Exchange Act [15 U.S.C.  
25 § 78o(a)(1)].

26 C. Good cause exists to believe that, unless restrained and enjoined by order of this  
27 Court, Defendants, and Relief Defendants Anthony Michael Alberto, Jr., ACAC  
28 LLC, BJ Holdings LLC, CJ Investments LLC, JL2 Investments, LLC, Monty

1 Crew LLC, PAJ Consulting Inc, Rocking Horse Properties LLC, Stirling  
 2 Consulting L.L.C., The Judd Irrevocable Trust, and Triple Threat Basketball, LLC  
 3 (collectively herein, "Relief Defendants"), will dissipate, conceal, or transfer  
 4 assets which could be the subject to an order directing disgorgement or the  
 5 payment of civil money penalties in this action. It is appropriate for the Court to  
 6 issue this Temporary Restraining Order so that prompt service on appropriate  
 7 financial institutions can be made, thus preventing the dissipation of assets.

- 8 D. Good cause exists to believe than an accounting of assets by each of the  
 9 Defendants is necessary.
- 10 E. Good cause exists to believe that, unless restrained and enjoined by order of this  
 11 Court, Defendants may alter or destroy documents relevant to this action.
- 12 F. Good cause exists to believe that expedited discovery is necessary.

13 **I.**

14 IT IS HEREBY ORDERED that the Commission's TRO Application is GRANTED.

15 **II.**

16 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,  
 17 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
 18 participation with any of them, who receive actual notice of this Order, by personal service or  
 19 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
 20 directly or indirectly, in the offer or sale of any securities, by the use of any means or instruments  
 21 of transportation or communication in interstate commerce or by use of the mails:

- 22 A. employing any device, scheme or artifice to defraud;
- 23 B. obtaining money or property by means of any untrue statement of a material fact  
 24 or any omission of a material fact necessary in order to make the statements  
 25 made, in light of the circumstances under which they were made, not misleading;  
 26 or
- 27 C. engaging in any transaction, practice, or course of business which operates or  
 28 would operate as a fraud or deceit upon the purchaser

1 in violation of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

2 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in  
3 Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who  
4 receive actual notice of this Order by personal service or otherwise: (a) Defendants' officers,  
5 agents, servants, employees, and attorneys; and (b) other persons in active concert or  
6 participation with Defendants or with anyone described in (a).

### 7 III.

8 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,  
9 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
10 participation with any of them, who receive actual notice of this Order, by personal service or  
11 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
12 directly or indirectly, in connection with the purchase or sale of any security, by use of any  
13 means or instrumentality of interstate commerce, or of the mails, or of any facility of any  
14 national securities exchange:

- 15 A. employing any device, scheme or artifice to defraud
- 16 B. making any untrue statement of a material fact or omitting to state a material fact  
17 necessary in order to make the statements made, in the light of the circumstances  
18 under which they were made, not misleading; or
- 19 C. engaging in any act, practice, or course of business which operates or would  
20 operate as a fraud or deceit on upon any person

21 in violation of Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5  
22 thereunder [17 C.F.R. § 240.10b-5].

23 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure  
24 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this  
25 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,  
26 and attorneys; and (b) other persons in active concert or participation with Defendants or with  
27 anyone described in (a).

### 28 IV.

1 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,  
2 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
3 participation with any of them, who receive actual notice of this Order, by personal service or  
4 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
5 directly or indirectly, in the absence of any applicable exemption:

6 A. unless a registration statement is in effect as to a security, making use of any  
7 means or instruments of transportation or communication in interstate commerce  
8 or of the mails to sell such security through the use or medium of any prospectus  
9 or otherwise;

10 B. unless a registration statement is in effect as to a security, carrying or causing to  
11 be carried through the mails or in interstate commerce, by any means or  
12 instruments of transportation, any such security for the purpose of sale or for  
13 delivery after sale; or;

14 C. making use of any means or instruments of transportation or communication in  
15 interstate commerce or of the mails to offer to sell or offer to buy through the use  
16 or medium of any prospectus or otherwise any security, unless a registration  
17 statement has been filed with the Commission as to such security, or while the  
18 registration statement is the subject of a refusal order or stop order or (prior to the  
19 effective date of the registration statement) any public proceeding or examination  
20 under Section 8 of the Securities Act [15 U.S.C. § 77h].

21 in violation of Section 5 of the Securities Act [15 U.S.C. § 77e].

22 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure  
23 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this  
24 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,  
25 and attorneys; and (b) other persons in active concert or participation with Defendants or with  
26 anyone described in (a).

27 V.  
28

1 IT IS FURTHER ORDERED that Defendants and their officers, agents, servants,  
2 employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
3 participation with any of them, who receive actual notice of this Order, by personal service or  
4 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
5 directly or indirectly, using any means or instrumentality of interstate commerce, or of the mails,  
6 or of any facility of any national securities exchange, to effect transactions in, or induce or  
7 attempt to induce the purchase or sale of, securities while not registered with the Commission as  
8 a broker or dealer or while not associated with an entity registered with the Commission as a  
9 broker or dealer in violation of Section 15(a)(1) of the Exchange Act [15 U.S.C. § 78o(a)(1)].

10 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure  
11 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this  
12 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,  
13 and attorneys; and (b) other persons in active concert or participation with Defendants or with  
14 anyone described in (a).

15 VI.

16 IT IS FURTHER ORDERED that Defendants Matthew W. Beasley, Jeffrey J. Judd,  
17 Beasley Law Group PC, J&J Consulting Services, Inc. (Alaska), J&J Consulting Services, Inc.  
18 (Nevada), and J and J Purchasing LLC, and their officers, agents, servants, employees, attorneys,  
19 subsidiaries and affiliates, and those persons in active concert or participation with any of them,  
20 who receive actual notice of this Order, by personal service or otherwise, and each of them, be  
21 and hereby are temporarily restrained and enjoined from, directly or indirectly, issuing,  
22 purchasing, or selling any security related to settled litigation claims, except for the purchase or  
23 sale of securities listed on a national securities exchange by these Defendants for their own  
24 personal accounts.

25 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure  
26 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this  
27 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,  
28

1 and attorneys; and (b) other persons in active concert or participation with Defendants or with  
2 anyone described in (a).

3 **VII.**

4 IT IS FURTHER ORDERED that Defendants Christopher R. Humphries, Shane M.  
5 Jager, Jason M. Jongeward, Denny Seybert, and Roland Tanner, and their officers, agents,  
6 servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
7 participation with any of them, who receive actual notice of this Order, by personal service or  
8 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
9 directly or indirectly, soliciting any person or entity to purchase or sell any security.

10 IT IS FURTHER ORDERED that, as provided in Federal Rule of Civil Procedure  
11 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this  
12 Order by personal service or otherwise: (a) Defendants' officers, agents, servants, employees,  
13 and attorneys; and (b) other persons in active concert or participation with Defendants or with  
14 anyone described in (a)

15 **VIII.**

16 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court,  
17 Defendants, Relief Defendants, and Defendants' and Relief Defendants' officers, agents,  
18 servants, employees, attorneys, subsidiaries and affiliates, and those persons in active concert or  
19 participation with any of them, who receive actual notice of this Order, by personal service or  
20 otherwise, and each of them, be and hereby are temporarily restrained and enjoined from,  
21 directly or indirectly, transferring, assigning, selling, hypothecating, changing, wasting,  
22 dissipating, converting, concealing, encumbering, or otherwise disposing of, in any manner, any  
23 funds, assets, securities, claims or other real or personal property, including any notes or deeds of  
24 trust or other interest in real property, wherever located, of any one of the Defendants or Relief  
25 Defendants, or their subsidiaries or affiliates, owned by, controlled by, managed by or in the  
26 possession or custody of any of them and from transferring, encumbering, dissipating, incurring  
27 charges or cash advances on any debit or credit card of the credit arrangement of any one of the  
28

Defendants or their subsidiaries and affiliates; including but not limited to the real and personal property below:

**Real Property**

| Property Address  | Owner                      |
|---|----------------------------|
| 9 Sky Arc Court, Henderson, Nevada<br>89012<br>APN: 178-33-610-039          | The Judd Irrevocable Trust |
| 8 Twisted Rock Court, Nevada 89012<br>APN: 178-33-510-037                   | The Judd Irrevocable Trust |
| 7329 Ravines Avenue, Las Vegas<br>Nevada 89131<br>APN: 125-10-115-020       | The Judd Irrevocable Trust |
| 599 N. Red Mountain Court, Heber City,<br>Utah 84032<br>APN: 00-0021 -0348  | The Judd Irrevocable Trust |
| 2314 E. La Sal Peak Drive, Heber City,<br>Utah 84032<br>APN: 00-0021-1113   | The Judd Irrevocable Trust |
| 19 Sky Arc Court, Henderson, Nevada<br>89012<br>APN: 178-33-210-004         | Jager Trust                |
| 29 Rockstream Drive, Henderson,<br>Nevada 89012<br>APN: 178-33-213-010      | Jager Trust                |
| 16 Paradise Valley Court, Henderson,<br>Nevada 89052<br>APN: 190-08-612-003 | Jager Trust                |



| Property Address   | Owner                     |
|--|---------------------------|
| 2394 E. La Sal Peak Drive, Heber City,<br>Utah 84032<br>APN: 00-0021-1104  | Jager Trust               |
| 2364 E. La Sal Peak Dr., Heber City,<br>Utah 84032<br>APN: 00-0021-1105  | Jager Trust               |
| 4015 Calle Lisa, San Clemente,<br>California 92672<br>APN: 060-231-23  | Jager Trust               |
| 5475 Ruffian Road, Las Vegas, Nevada<br>89149<br>APN: 126-36-501-029   | Matthew and Paula Beasley |
| 5485 Ruffian Rd. Las Vegas, Nevada<br>89149<br>APN: 126-36-501-030   | Matthew and Paula Beasley |
| Real property located at the corner of W.<br>Stephen Ave. & Ruffian Rd., Las Vegas,<br>Nevada 89149<br>APN: 126-36-501-031 | Matthew and Paula Beasley |
| Real property located at the corner of W.<br>Hammer Ln. & Ruffian Rd., Las Vegas,<br>Nevada 89149<br>APN: 126-36-501-017   | Matthew and Paula Beasley |
| 2143 Via Regina Coeli Street, Mt.<br>Charleston, Nevada 89124<br>APN: 129-02-410-074                                       | Matthew and Paula Beasley |

**Personal Property**

2021 Bentley GT convertible  
2020 Rolls Royce Dawn  
2022 Rolls Royce Cullinan  
2019 Ferrari 812 Superfast  
Hawker 900XP private jet  
2021 Bentley Continental  
2020 Bentley Continental  
2020 Mercedes Benz G63 AMG  
Two 2020 Porsche Taycans  
2020 Ashton Martin Vantage  
2018 Porsche 911  
2020 Porsche Cayenne  
2019 Cadillac Escalade  
2019 Lexus LX  
2017 Chevrolet Corvette Z06  
2018 Land Rover Range Rover  
2018 Chevrolet Camaro  
2018 Mercedes Benz E43 AMG  
2019 Toyota 4Runner  
RVs of unknown year, make and model  
ATVs of unknown year, make and model  
Boats of unknown year, make and model

**IX.**

IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, an immediate freeze shall be placed on all monies and assets (with an allowance for necessary and reasonable living expenses to be granted only upon good cause shown by application to the Court with notice to and an opportunity for the Commission to be heard) in all accounts at any

bank, financial institution or brokerage firm, or third-payment payment processor, all certificates of deposit, and other funds or assets, held in the name of, for the benefit of, or over which account authority is held by Defendants and Relief Defendants, including but not limited to the accounts listed below:

| BROKERAGE / BANK NAME | ACCOUNT NAME   | ACCOUNT NUMBER |
|-----------------------|--|----------------|
| Wells Fargo           | Beasley Law Group PC   | XXXXXXX5580    |
| Bank of Nevada        | Beasley Law Group PC (NV IOLTA Acct)                                       | XXXXXXX5598    |
| Wells Fargo           | Beasley Law Group PC (NV IOLTA Acct)                                       | XXXXXXX8898    |
| Wells Fargo           | Bugraiders Pest Control, LLC   | XXXXXXX0377    |
| Wells Fargo           | Bugraiders Pest Control, LLC   | XXXXXXX9745    |
| Wells Fargo           | CJ Investments LLC   | XXXXXXX6358    |
| Wells Fargo           | Jessica A Humphries & Christopher R Humphries                              | XXXXXXX0836    |
| Wells Fargo           | Jessica A Humphries & Christopher R Humphries                              | XXXXXXX2164    |
| Wells Fargo           | Jessica A Humphries & Christopher R Humphries                              | XXXXXXX5547    |
| Wells Fargo           | J & J Consulting   | XXXXXXX0153    |
| Wells Fargo           | Nevada Pro Pest Control Inc.; dba Nevada Pest Control; dba Pigeons Be Gone | XXXXXXX6540    |
| Wells Fargo           | Stirling Consulting LLC  | XXXXXXX6558    |
| Wells Fargo           | Shane Jager  | XXXXXXX09335   |

| <b>BROKERAGE / BANK<br/>NAME</b> | <b>ACCOUNT NAME</b>  | <b>ACCOUNT NUMBER</b> |
|----------------------------------|--|-----------------------|
| Wells Fargo                      | Nevada Pro Pest Control Inc.;<br>dba Nevada Pest Control; dba<br>Pigeons Be Gone | XXXXXXX1189           |
| Wells Fargo                      | Triple Threat Basketball,<br>LLC   | XXXXXXX2948           |
| Wells Fargo                      | Triple Threat Basketball,<br>LLC   | XXXXXXX9671           |
| Wells Fargo                      | Triple Threat Basketball,<br>LLC   | XXXXXXX2643           |
| Wells Fargo                      | Triple Threat Basketball,<br>LLC (savings)                                       | XXXXXXX3578           |
| US Bank                          | Judd Nevada Trust; Jeffrey J<br>Judd Trustee; Jennifer R Judd<br>Trustee         | XXXXXXXXXX0331        |
| US Bank                          | Jeffrey Judd   | XXXXXXXXXX4223        |
| US Bank                          | Jeffrey Judd   | XXXXXXXXXX4207        |
| US Bank                          | CJ Investments LLC   | XXXXXXXXXX0526        |
| US Bank                          | Target Marketing Insurance<br>Services Inc                                       | XXXXXXXXXX0841        |
| US Bank                          | The CJ Humphries<br>Foundation   | XXXXXXXXXX0913        |
| US Bank                          | Christopher Ronn<br>Humphries; Jessica Allison<br>Humphries                      | XXXXXXXXXX1591        |
| US Bank                          | J&J Consulting Services, Inc   | XXXXXXXXXX2073        |

| <b>BROKERAGE / BANK<br/>NAME</b> | <b>ACCOUNT NAME</b>   | <b>ACCOUNT NUMBER</b> |
|----------------------------------|---|-----------------------|
| US Bank                          | Target Managers Insurance<br>Services Inc                                   | XXXXXXXXX3156         |
| US Bank                          | The Judd Family Foundation  | XXXXXXXXX3495         |
| US Bank                          | Matthew W Beasley; Paula C<br>Beasley; Matthew Beasley                      | XXXXXXXXX4338         |
| US Bank                          | Jeffrey J Judd Tstee/Grnt;<br>Judd Family Trust; Jennifer R<br>Judd Trustee | XXXXXXXXX5473         |
| US Bank                          | Jeffrey J Judd Tstee/Grnt;<br>Judd Family Trust; Jennifer R<br>Judd Trustee | XXXXXXXXX6245         |
| US Bank                          | Matthew W Beasley; Paula C<br>Beasley; Matthew Beasley                      | XXXXXXXXX7143         |
| US Bank                          | Christopher Ronn<br>Humphries; Jessica Allison<br>Humphries                 | XXXXXXXXX8067         |
| US Bank                          | Judd Nevada Trust; Jeffrey J<br>Judd Trustee; Jennifer R Judd<br>Trustee    | XXXXXXXXX3033         |
| US Bank                          | Expert Litigation Services Inc  | XXXXXX9682            |
| US Bank                          | PAJ Consulting Inc  | XXXXXXXXX3503         |
| US Bank                          | Priscilla Rosegreen; Warren<br>Rosegreen                                    | XXXXXXXXX4389         |
| US Bank                          | Priscilla Rosegreen; Warren<br>Rosegreen                                    | XXXXXXXXX9713         |
| US Bank                          | BJ Holdings LLC   | XXXXXXXXX0010         |

| BROKERAGE / BANK<br>NAME | ACCOUNT NAME     | ACCOUNT NUMBER |
|--------------------------|------------------|----------------|
| Citibank                 | Warren Rosegreen | XXXXXXXX2878   |

Any bank, financial institution or brokerage firm, or third-party payment processor holding such monies or assets described above shall hold and retain within their control and prohibit the withdrawal, removal, transfer or other disposal of any such funds or other assets except as otherwise ordered by this Court.

**X.**

IT IS FURTHER ORDERED that Defendants, within five days of the issuance of this Order, shall prepare and deliver to the Commission a detailed and complete schedule of all of their personal assets, including all real and personal property exceeding \$5,000 in value, and all bank, securities, and other accounts identified by institution, branch address and account number. The accounting shall include a description of the sources of all such assets. Such accounting shall be simultaneously filed with the Court and a copy shall be delivered to the Commission to the attention of Tracy S. Combs, counsel for the Commission, by electronic mail at [combst@sec.gov](mailto:combst@sec.gov). After completion of the accounting, each of the Defendants shall produce to the Commission, at a time agreeable to the Commission, all books, records and other documents supporting or underlying their accounting.

**XI.**

IT IS FURTHER ORDERED that any person who receives actual notice of this Order by personal service or otherwise, and who holds, possesses or controls assets exceeding \$5,000 for the account or benefit of any one of the Defendants, shall within 5 days of receiving actual notice of this Order provide counsel for the Commission with a written statement identifying all such assets, the value of such assets, or best approximation thereof, and any account numbers or account names in which the assets are held.

**XII.**

1 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, each of the  
 2 Defendants, and their officers, agents, servants, employees, attorneys, subsidiaries and affiliates,  
 3 and those persons in active concert or participation with any of them, who receive actual notice  
 4 of this Order, by personal service or otherwise, and each of them, be and hereby are temporarily  
 5 restrained and enjoined from, directly or indirectly: destroying, mutilating, concealing,  
 6 transferring, altering, or otherwise disposing of, in any manner, any documents, which includes  
 7 all books, records, computer programs, computer files, computer printouts, contracts, emails,  
 8 correspondence, memoranda, brochures, or any other documents of any kind in their possession,  
 9 custody or control, however created, produced, or stored (manually, mechanically, electronically,  
 10 or otherwise) pertaining in any manner to Defendants or to the allegations alleged in the  
 11 Commission's complaint.

### 12 XIII.

13 IT IS FURTHER ORDERED that the Commission's application for expedited discovery  
 14 concerning Defendants and their assets and activities is granted and that, commencing with the  
 15 time and date of this Order, in lieu of the time periods, notice provisions, and other requirements  
 16 of Rules 26, 30, 33, 34, 36, and 45 of the Federal Rules of Civil Procedure and the corresponding  
 17 Local Rules of this Court, discovery shall proceed as follows:

- 18 A. Pursuant to Rule 30(a) of the Federal Rules of Civil Procedure, the Commission  
 19 may take video depositions of parties or any third parties upon oral examination  
 20 on two days' notice of any such depositions. Depositions may be taken Monday  
 21 through Saturday. As to Defendants, and their agents, servants, promoters,  
 22 employees, brokers, associates, and any person who transferred money to or  
 23 received money from the bank accounts identified above, the Commission may  
 24 depose such witnesses after service a deposition notice by facsimile, electronic  
 25 mail, hand or overnight courier upon such individuals, and without serving a  
 26 subpoena on such witness. Depositions that have not been signed by the witness  
 27 may be used for purposes of the hearing on the SEC's application for preliminary  
 28 injunction;

B. Pursuant to Rule 45 and the applicable provisions in the Securities Act and Exchange Act, each party may serve subpoenas to third parties; and

C. All discovery requests and responses may be served via email, facsimile, or by hand on counsel for the parties.

**XIV.**

IT IS FURTHER ORDERED that the representatives of the Commission and any other government agency are authorized to have continuing access to inspect or copy any or all of the corporate books and records and other documents of Defendants and their subsidiaries and affiliates, and continuing access to inspect their funds, property, assets and collateral, wherever located.

**XV.**

IT IS FURTHER ORDERED that this Temporary Restraining Order shall expire on April 22, 2022 unless for good cause shown it is extended or the parties against whom it is directed consent that it may be extended for a longer period.

**XVI.**

IT IS FURTHER ORDERED that on April 21, 2022 at 10:00 a.m., the Defendants, and each of them, shall appear before the Honorable James C. Mahan, Judge of the United States District Court of Nevada, for a hearing to show cause, if there be any, why a preliminary injunction should not be granted. Any declarations, affidavits, points and authorities in opposition to, the issuance of such an Order shall be filed with the Court and emailed to Tracy S. Combs, counsel for the Commission, at [combst@sec.gov](mailto:combst@sec.gov), and the offices of the Defendants or their attorneys no later than 4:00 p.m., on Tuesday, April 19, 2022.

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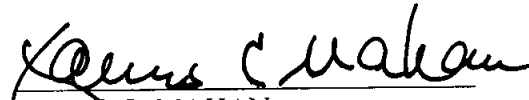


XVII.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for the purpose of implementing and carrying out the terms of all orders and decrees which may be entered herein and to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

IT IS SO ORDERED.

Date: April 13, 2022  
Time: 11:00 am

  
JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE

Presented by:  
Tracy S. Combs  
Casey R. Fronk  
Attorneys for Plaintiff  
Securities and Exchange Commission